

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,) **INDICTMENT** CR 05-335 JMR/FLN
Plaintiff,) (18 U.S.C. § 2251(a))
v.) (18 U.S.C. § 2251(b))
) (18 U.S.C. § 2251(e))
BRUCE W. BETCHER,)
Defendant.)
)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Production of Child Pornography)

In or about 2004, the exact dates being unknown to the Grand Jury, in the State and District of Minnesota, the defendant,

BRUCE W. BETCHER,

being the legal guardian and having custody and control of K.O., a minor, knowingly permitted K.O. to engage in, and to assist another person to engage in, sexually explicit conduct, specifically the lascivious exhibition of the genital and pubic area of K.O. and other minors, for the purpose of producing visual depictions of such conduct, where the visual depictions were produced using materials, including but not limited to an Olympus digital camera, that have been mailed, shipped, and transported in interstate and foreign commerce by any means and which visual depictions were

SCANNED

OCT 13 2005

U.S. DISTRICT COURT MPLS

FILED OCT 19 2005
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actually transported in interstate and foreign commerce, including but not limited to the following computer image files:

- 1) P5300010.JPG
- 2) P5300011.JPG
- 3) P9180018.JPG
- 4) P9180021.JPG

in violation of Title 18, United States Code, Sections 2251(b) and 2251(e).

COUNT 2

(Production of Child Pornography)

In or about 2004, the exact dates being unknown to the Grand Jury, in the State and District of Minnesota, the defendant,

BRUCE W. BETCHER,

being the legal guardian and having custody and control of K.B.O., a minor, knowingly permitted K.B.O. to engage in, and to assist another person to engage in, sexually explicit conduct, specifically the lascivious exhibition of the genital and pubic area of K.B.O. and other minors, for the purpose of producing visual depictions of such conduct, where the visual depictions were produced using materials, including but not limited to an Olympus digital camera, that have been mailed, shipped, and transported in interstate and foreign commerce by any means and which visual depictions were actually transported in interstate and foreign

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commerce, including but not limited to the following computer image files:

- 1) P3260003.JPG
- 2) P5300006.JPG
- 3) P5300007.JPG
- 4) P5300008.JPG
- 5) P7160023.JPG
- 6) P9180001.JPG
- 7) P9180018.JPG
- 8) PA090058.JPG
- 9) PB140004.JPG

in violation of Title 18, United States Code, Sections 2251(b) and 2251(e).

COUNT 3

(Production of Child Pornography)

In or about 2004, the exact dates being unknown to the Grand Jury, in the State and District of Minnesota, the defendant,

BRUCE W. BETCHER,

did knowingly employ, use, persuade, induce, entice, and coerce K.O., a minor, to engage in, and to assist another person to engage in, sexually explicit conduct, namely the lascivious exhibition of the genital and pubic area of K.O. and other minors, for the purpose of producing visual depictions of such conduct, where the visual depictions were produced using materials, including but not limited to an Olympus digital camera, that have been mailed,

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shipped, and transported in interstate and foreign commerce by any means, and which visual depictions were actually transported in interstate commerce, including but not limited to the following computer image files:

- 1) P5300010.JPG
- 2) P5300011.JPG
- 3) P9180018.JPG
- 4) P9180021.JPG

in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 4

(Production of Child Pornography)

In or about 2004, the exact dates being unknown to the Grand Jury, in the State and District of Minnesota, the defendant,

BRUCE W. BETCHER,

did knowingly employ, use, persuade, induce, entice, and coerce K.B.O., a minor, to engage in, and to assist another person to engage in, sexually explicit conduct, namely the lascivious exhibition of the genital and pubic area of K.B.O. and other minors, for the purpose of producing visual depictions of such conduct, where the visual depictions were produced using materials, including but not limited to an Olympus digital camera, that have been mailed, shipped, and transported in interstate and foreign

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commerce by any means, and which visual depictions were actually transported in interstate commerce, including but not limited to the following computer image files:

- 1) P3260003.JPG
- 2) P5300006.JPG
- 3) P5300007.JPG
- 4) P5300008.JPG
- 5) P7160023.JPG
- 6) P9180001.JPG
- 7) P9180018.JPG
- 8) PA090058.JPG
- 9) PB140004.JPG

in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 5

(Production of Child Pornography)

In or about 2004, the exact dates being unknown to the Grand Jury, in the State and District of Minnesota, the defendant,

BRUCE W. BETCHER,

did knowingly employ, use, persuade, induce, entice, and coerce J.K., a minor, to engage in, and to assist another person to engage in, sexually explicit conduct, namely oral-genital contact and the lascivious exhibition of the genital and pubic area of J.K. and other minors, for the purpose of producing visual depictions of such conduct, where the visual depictions were produced using

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materials, including but not limited to an Olympus digital camera, that have been mailed, shipped, and transported in interstate and foreign commerce by any means, and which visual depictions were actually transported in interstate commerce, including but not limited to the following computer image files:

- 1) P5300007.JPG
- 2) P5300008.JPG
- 3) P5300009.JPG
- 4) PA090046.JPG
- 5) PA090058.JPG
- 6) PA090065.JPG
- 7) PC030010.JPG

in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 6

(Production of Child Pornography)

In or about 2004, the exact dates being unknown to the Grand Jury, in the State and District of Minnesota, the defendant,

BRUCE W. BETCHER,

did knowingly employ, use, persuade, induce, entice, and coerce A.W., to engage in, and to assist another person to engage in, sexually explicit conduct, namely the lascivious exhibition of the genital and pubic area of A.W. and other minors, for the purpose of producing visual depictions of such conduct, where the visual

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depictions were produced using materials, including but not limited to an Olympus digital camera, that has been mailed, shipped, and transported in interstate and foreign commerce by any means, and which visual depictions were actually transported in interstate commerce, including but not limited to the following computer image files:

- 1) P3260009.JPG
- 2) P3260011.JPG
- 3) P3260014.JPG
- 4) P9180018.JPG
- 5) P9180022.JPG

in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 7

(Production of Child Pornography)

In or about 2004, the exact dates being unknown to the Grand Jury, in the State and District of Minnesota, the defendant,

BRUCE W. BETCHER,

did knowingly employ, use, persuade, induce, entice, and coerce M.K., to engage in, and to assist another person to engage in, sexually explicit conduct, namely the lascivious exhibition of the genital and pubic area of M.K. and other minors, for the purpose of producing visual depictions of such conduct, where the visual

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depictions were produced using materials, including but not limited to an Olympus digital camera, that have been mailed, shipped, and transported in interstate and foreign commerce by any means, and which visual depictions were actually transported in interstate commerce, including but not limited to the following computer image files:

- 1) P7160015.JPG
- 2) P7160020.JPG
- 3) P7160021.JPG
- 4) P7160025.JPG
- 5) P7160026.JPG
- 6) P7170011.JPG
- 7) P7170012.JPG
- 8) PC120003.JPG
- 9) PC120004.JPG

in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

FORFEITURE ALLEGATIONS

Counts 1 through 7 of this Indictment are hereby re-alleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant,

BRUCE W. BETCHER,

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shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a), all his right, title and interest in:

- (1) any visual depiction described in section 2251, 2251A, or 2252 of chapter 110, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of the violations alleged in Counts 1 through 7 of this Indictment.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

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it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(o), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 2251 and 2253(a).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON